

Honorable Ricardo S. Martinez

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

CHERYL BISHOP,

Plaintiff,

v.

MERRICK GARLAND, ATTORNEY  
GENERAL, DEPARTMENT OF JUSTICE,  
ALCOHOL, TOBACCO, FIREARMS AND  
EXPLOSIVES,

Defendant.

No. 2:20-CV-01375 RSM

STIPULATION AND (PROPOSED)  
ORDER TO EXTEND DISCOVERY  
DEADLINE FOR THE PURPOSE OF  
TAKING DEPOSITIONS

NOW COME Plaintiff Cheryl Bishop and Defendant Merrick Garland, Attorney General, by and through their respective counsel and jointly request that the Court modify the discovery deadline from November 29, 2021, to December 15, 2021, for the limited purpose of Plaintiff's depositions of (1) Defendants' Rule 30(b)(6) designee and (2) ATF employee Tehran Palmer.

The parties are cooperating in discovery and believe that the adjustments are necessary for the orderly development of the case, and the requested adjustment to the case schedule will not impact other deadlines and will not affect the trial date.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

MacDONALD HOAGUE & BAYLESS

NICHOLAS W. BROWN  
United States Attorney

STIPULATION AND (PROPOSED) ORDER TO EXTEND  
DISCOVERY DEADLINE FOR THE PURPOSE OF TAKING  
DEPOSITIONS - 1

MACDONALD HOAGUE & BAYLESS  
705 Second Avenue, Suite 1500  
Seattle, Washington 98104  
Tel 206.622.1604 Fax 206.343.3961

1 DATED: November 12, 2021

DATED: November 12, 2021

<p>2 <u>s/ Jesse Wing</u></p> <p>3 Jesse Wing, WSBA #27751</p> <p>4 McDonald Hoague &amp; Bayless</p> <p>5 705 Second Avenue, Suite 1500</p> <p>6 Seattle, Washington 98104</p> <p>7 Phone: 206-622-1604</p> <p>8 Email: <a href="mailto:JesseW@MHB.com">JesseW@MHB.com</a></p> <p>9 <i>Attorney for Plaintiff</i></p>	<p><u>s/ Randy J. Tanner</u></p> <p>Mark Steger Smith, #4160</p> <p>Randy J. Tanner, #11609</p> <p>Special Assistant U. S. Attorneys</p> <p>U.S. Attorney's Office</p> <p>105 E. Pine, 2<sup>nd</sup> Floor</p> <p>Missoula, MT 59802</p> <p>Phone: (406) 329-4268</p> <p>Email: <a href="mailto:mark.smith3@usdoj.gov">mark.smith3@usdoj.gov</a></p> <p><a href="mailto:randy.tanner@usdoj.gov">randy.tanner@usdoj.gov</a></p> <p><i>Attorneys for Defendant</i></p>
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11 PURSUANT TO STIPULATION, IT IS SO ORDERED that

- 12 1. Discovery Deadline is extended to December 15, 2021, for the limited purpose of
- 13 Plaintiff's depositions of (1) Defendants' Rule 30(b)(6) designee and (2) ATF employee
- 14 Tehran Palmer.

15 DATED: This \_\_\_\_\_ day of November, 2021.

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18 Hon. Ricardo S. Martinez

19 Chief United States District Judge

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STIPULATION AND (PROPOSED) ORDER TO EXTEND  
DISCOVERY DEADLINE FOR THE PURPOSE OF TAKING  
DEPOSITIONS - 2

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CERTIFICATE OF SERVICE

I certify that on the date noted below I electronically filed the above-entitled document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following persons:

NICHOLAS W. BROWN  
United States Attorney

Mark Smith, [mark.smith3@usdog.gov](mailto:mark.smith3@usdog.gov)  
Randy Tanner, [randy.tanner@usdoj.gov](mailto:randy.tanner@usdoj.gov)  
Assistant U.S. Attorneys

DATED this 12th day of November, 2021, at Seattle, Washington.

s/ Marry Marze  
Marry Marze, Legal Assistant